



# Fair Processing Notice

# Introduction

Our Fair Processing Notice explains how we use your personal data, describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).

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# Summary

## Who we are

**Dunfermline Trophy Centre Ltd** is a company registered in Scotland. You can get in touch with our Responsible Person by email at [sales@dunfermlinetrophycentre.com](mailto:sales@dunfermlinetrophycentre.com) or by post at **23 Guildhall Street, Dunfermline, KY12 7NR**

## Your rights

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the data protection regulator. Find out the best way to be in touch with us at: [www.dunfermlinetrophycentre.com](http://www.dunfermlinetrophycentre.com)  
*Section 3 gives you more information about your privacy rights.*

## How we gather personal information

We only gather information from details you provide to us directly. This can be at our counter when ordering goods or services, by email, through our website contact form, through Social Media or by telephone. We may also use CCTV to record images - see separate Notice, if applicable.  
*See section 5 for more details about how we gather personal information.*

## How we use your personal information

We use your personal information to provide you with products and services. This allows us to contact you for additional information regarding your purchase and to advise when delivery is ready.  
*Find out more about how we use your personal information in section 6.*

## Sharing and transferring personal information

We may need to share information with suppliers to fulfill your order or purchase. We will NOT share any information with third parties outside the UK unless required to do so by law.  
*Sections 8 and 9 will give you further details about this.*

## Keeping personal information

We keep your personal information securely for as long as we need to for the purposes described in section 10.

## Your consent

We won't always need consent to use personal information - for example if we need it to meet regulatory requirements or to perform a contract with you.

# Full Fair Processing Notice

## 1. Introduction

- 1.1. We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information – that includes the personal information we already hold about you now and the further personal information we might collect about you. How we use your personal information will depend on the products and services we provide to you.
- 1.2. This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data). We will update this Privacy Notice if we make any significant changes affecting how we use your personal information.

## 2. About us

We are what is known as the ‘controller’ of personal information we gather and use. When we say ‘we’ or ‘us’ in this Privacy Notice, we mean ***Dunfermline Trophy Centre Ltd.***

## 3. Your Privacy Rights

- 3.1. You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else. You can make a complaint to us by finding the best way to be in touch via the details on our website [www.dunfermlinetrophycentre.com](http://www.dunfermlinetrophycentre.com)
- 3.2. **Right to object:** You can object to our processing of your personal information. Please contact us as noted above, providing details of your objection.
- 3.3. **Access to your personal information:** You can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with & how long we keep it for. You can make a request for access free of charge by contacting us as noted above. Please make all requests for access in writing, and provide us with evidence of your identity.
- 3.4. **Right to withdraw consent:** If you have given us your consent to use personal information, you can withdraw your consent at any time and, update your marketing preferences by calling us directly.
- 3.5. **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- 3.6. **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- 3.7. **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- 3.8. **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- 3.9. **Make a complaint:** You can make a complaint about how we have used your personal information to us, by contacting us via the details on our website [www.dunfermlinetrophycentre.com](http://www.dunfermlinetrophycentre.com) or to a supervisory authority – for the UK this is the Information Commissioner’s Office at <https://ico.org.uk> We will not make any charge for responding to any request from you to exercise your privacy rights, and we will respond to your requests in accordance with our obligations under data protection law.

## 4. What kinds of personal information we use

- 4.1. We use a variety of personal information depending on the products and services we deliver to you.
- 4.2. For all products and services, we may need to use your name, address & contact details
- 4.3. For suppliers to our business, we may also need to know your Bank Account details for payment.

## 5. How we gather your personal information

We obtain personal information:

- directly from you, for example when you fill out an order form;
- from other people who know you.
- we also may obtain some personal information when we use CCTV. We may use CCTV on our premises to ensure the safety and security of our staff and customers.

## 6. How we use your personal information

To provide you with any products and services we may need to know your name, address & contact information. For suppliers, we may need to know your Bank Account details.

We sometimes need to gather, use and share additional personal information for specific purposes, which are set out in more detail below.

**6.1. To operate and administer our products and services, including dealing with your complaints, clarifying information and fixing our mistakes, we will use:** your contact details

6.2. We might share all of the information we use for this purpose with third parties who help us to verify your contact details and deliver our products and services, such as our subcontractors and our own service providers for payment processing. We use your information in this way because it is necessary to perform our contract with you and to meet our legal obligations.

**6.3. To administer payments to and from you, we will use:** your contact details and the payment details that you have provided to us. We may give this information to our third party payment providers to process the payment to you or from you.

**6.4. To comply with our legal obligations, to prevent financial crime including fraud and money laundering we will use:**

- any information you have given us, that we have obtained from a third party, or that we have obtained by looking at how you use our services, where it is necessary for us to use that information to comply with a legal obligation;
- this information will include name, address, your IP address, payment details and other contact information, and
- We will give information to and receive information from third parties where that is necessary to meet our legal obligations, including fraud prevention agencies, the police and other law enforcement and government agencies.

**6.5. For debt recovery purposes, we will use:**

- (a) your contact details;
- (b) information we obtain from looking at how you have used our services, including information about your location that we may find from reviewing your account.

6.6. We will give information to and receive information from third parties where that is necessary to recover debts due by you to us, for example, debt recovery agents and sheriff officer or bailiff services. This might include passing personal information about you to a third party who we have transferred your debt to, and who will then contact you directly to collect that debt. If your debt is transferred to a third party you will be advised of the identity of that third party. We use your information in this way because it is necessary to perform our contract with you, to exercise our legal rights, and because it is fair and reasonable for us to do so.

## 7. Our legal basis for using your personal information

7.1. We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

- (a) we have your consent (if consent is needed);
- (b) we need to use the information to comply with our legal obligations;
- (c) we need to use the information to perform a contract with you; and/or
- (d) it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services.

7.2. Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent.

We will not request or hold any of the following information:

- **Health information**
- **Racial/ethnic origin**
- **Criminal information**

## **8. Sharing your personal information with or getting your personal information from others**

8.1. We will share personal information to meet or enforce a legal obligation or where it is fair and reasonable for us to do so. See section 6 'How we use your personal information' for more information about how we do this. We will only share your personal information to the extent needed for those purposes.

8.2. Who we share your personal information with depends on the products and services we provide to you and the purposes we use your personal information for. For most products and services we will share your personal information with our own service providers such as our IT Suppliers and fraud prevention agencies. See section 6 'How we use your personal information' for more information on who we share your personal information with and why.

8.3. Most of the time the personal information we have about you is information you have given to us, or gathered by us in the course of providing products and services to you. We also sometimes gather personal information from and send personal information to third parties where necessary for fraud prevention or marketing purposes, for example so you can receive the best offers from us and our partners. See section 6 'How we use your personal information' for more information on who we get your personal information from and why.

## **9. Transfers outside the UK**

9.1. We do not see a need to transfer your information outside the UK or EEA.

## **10. How long we keep your personal information for**

10.1. How long we keep your personal information for depends on the products and services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

10.2. We keep other personal information we use for seven years from the date you last used one of our services.

## **11. Keeping you up to date**

11.1. We will communicate with you about products and services we are delivering using any contact details you have given us – for example by post, email, text message, social media, and notifications on our app or website.

11.2. Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by visiting us or calling us directly. For contact details, visit our website [www.dunfermlinetrophycentre.com](http://www.dunfermlinetrophycentre.com)

## **12. Your online activities**

12.1. We use cookies to track your use of our website. We may use cookies to provide tailored marketing messages when you are logged into our website, if you have given us consent.

12.2. A cookie is a small file which is sent to your browser and stored on your computer's hard disc and helps us understand and track your use of our websites and where we can improve the information and services provided. We use cookies solely to gather information on IP addresses, to analyse trends, administer the website, track your movements on the website and gather broad demographic information for aggregate use. For information about blocking the use of cookies, please refer to the instructions/help screen on your internet browser. Please note that you may not be able to use or access certain parts of the website or online services if you block the use of all cookies.